OHM Remediation Services Corp.
A Subsidiary of OHM Corporation

WORK PLAN FOR CENTRAL STEEL DRUM 704-738 DOREMUS AVENUE NEWARK, NEW JERSEY

Prepared for:

U.S. Environmental Protection Agency
Region II
Edison, New Jersey

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TABLE OF CONTENTS

1.0 INTRODUCTION

1.1 SITE HISTORY

The site is located at 704-738 Doremus Avenue, Newark, New Jersey. The site was originally occupied by an ink manufacturer (International Printing Ink, Division of Interchemical Corporation, now part of Inmont Corp.). In 1952, Central Steel and Drum began operating a drum reconditioning facility which operated until 1991. After the closing of Central Steel and Drum, the property was leased to another party. According to NJDEP, the property has been abandoned since 1994.

The site consists of one main building (previously several buildings which are now interconnected). It has been used as a commercial dumping ground (evidenced by truck tires, construction debris, etc.). There is a chain link fence along the perimeter of the property. The main gate is missing, however, concrete barriers have been placed to impede entry onto the property.

The EPA performed an Emergency Response Action on March 14-15, 1997 and discovered approximately 500 drums of unknown waste were abandoned throughout the building/site. There are also several incinerator ash piles and areas where incinerator ash has apparently been spread out along the ground.

1.2 PROJECT WORK PLAN ORGANIZATION

Contained within the project work plan are the following:

- Work Plan (WP) - The work plan discusses the specific task required by the scope of services. It identifies key personnel and equipment used to complete the cleanup.
- Site Safety and Health Plan (SSHP) - This plan has been prepared and reviewed by an OHM Certified Industrial Hygienist.
- Sampling, Analysis and Quality Assurance Plan (SAQAP) - This plan has been prepared by OHM's field analytical department.

2.0 SCOPE OF WORK

OHM understands the scope of work for the Central Steel project to include:

- Set up support facilities
- Sample tanks, drummed wastes and ash piles
- Secure deteriorated containers
- Perform field hazardous categorization testing (hazcat)
- Develop test bulking scheme and generate composite samples for disposal analysis
- Analyze composite samples to characterize wastes for disposal
- Bulk composite wastes
- Labpack small containers as necessary
- Dispose of wastes
- Remove, clean and dispose of two (2) underground storage tanks (UST's)

3.0 TECHNICAL APPROACH

3.1 MOBILIZATION

Personnel and equipment required to perform the scope of work will be obtained from the nearest available resources. The following information outlines the proposed personnel and major equipment which will be mobilized for the execution of the project.

Personnel	Equipment
1-Response Manager	1-60' Double Office, Trailer
1-Chemist (as needed)	1-Mini Laboratory Trailer
1-Project Accountant	1-Pick-up Truck
2-Equipment Operators	2-Passenger Vans
4-Recovery Technicians	1-Track Loader
1-T&D Coordinator (as needed)	1-Excavator with Grappler Attachment
1-Electrician (as needed)	1-Bobcat or backhoe
	1-Computer with scanner and zip drive
	1-LEL/0_2
	1-PID
	1-Logger Note Pad

3.2 SITE PREPARATION

Upon completion of mobilization, OHM will begin site preparation activities. OHM will conduct a site safety meeting prior to commencement of any site activities. Once the safety meeting is completed, site setup shall begin.

Site preparation will include the delineation of work and support zones and preparation of container staging areas. High visibility fence will be used to establish the boundary for the exclusion zone. Support zone activity will include the set-up of an office trailer, a mini lab, portable sanitary facilities, and utility hook-ups.

Several areas within the main building will be cleared of debris for use as staging or bulking areas. This will require the relocation of solid waste to an area designated by the OSC. Any small containers encountered during this waste relocation will be staged in close proximity to the buildings main entrance. Areas designated as staging areas will be swept clean and floor sweepings will be stockpiled elsewhere within the building for later disposal.

The entire building will be inspected for empty containers which will be staged within the building. All empty containers will be crushed, stockpiled, and loaded into rolloff containers or dump trailers for future disposal. Containers which are not empty inside the building will be numbered and their location will be logged prior to moving them to designated staging areas.

3.3 DRUM STAGING

All containers will be staged in rows in a designated area near an entrance of the building. While every effort will be made by OHM to prevent the release of material during the drum handling operations, there is an increased risk of release due to the extreme, deteriorated condition of the drums. A drum containing spill control materials and equipment shall be staged in close proximity to the staging activities.

Prior to handling, each drum will be inspected to determine its integrity and proper handling technique to be utilized. Each drum will be monitored with a photoionization detector (PID) and readings will be recorded in a log for future reference. Additionally, any markings found on the drum will be recorded as discussed in the sampling, analysis and quality assurance plan (SAQAP). Drums which require on-site waste categorization or additional analytical will be numbered prior to being moved to the designated staging areas within the main building.

OHM technicians will inspect all drums to insure integrity. Any drums that fail visual inspection will be sampled in place, placed into the trackloader bucket and transported to the designated staging area. If the integrity of the drum is determined to be sound, technicians will transport the drum to a designated row in the staging area using a drum cart/or excavator with drum grapplers.

3.4 CONTAINER INVENTORY

EPA has identified several containers of five gallons or greater and additional small containers of labpack quantity. OHM sample technicians shall inspect each container to determine their physical integrity. Containers determined to be in poor physical condition shall be overpacked prior to moving to the staging area. Once in the staging area, each container receives a unique ID number and is inventoried.

3.5 EMPTY CONTAINERS DISPOSAL

Drums and containers that are found to be empty or RCRA empty are to be staged in an area away from sampling activities. Containers will be crushed and stockpiled for later disposal. Empty containers will not be inventoried by the OHM sampling team.

3.6 MATERIAL BULKING

At the completion of hazcat analysis, the containerized waste materials will be separated into categories of similar chemical characteristics. At this time, a decision shall be made if consolidation of containers within each waste stream is warranted based upon the volume of material in the containers. Individual drum logs shall serve as documentation for any on site laboratory data. In the event that drum bulking is to be performed, the following procedures are to be followed.

Bench scale bulk testing of materials in the same waste stream shall be conducted to determine waste compatibility as described in the SAQAP. Drum bulking can then be commenced after approval by the OHM chemist and the site supervisor. For liquid waste streams, a manually operated guzzler pump shall be used to transfer the material from the drums into the receiving bulk drum. Drums containing solids shall be emptied out using the excavator with grappler attachment into piles for loading into dump trailers. All material bulking shall occur in an area separate from the staging area. The OHM Chemist will oversee the bulking operation and properly document the sequence of containers consolidated as determined by benchscale testing.

In addition to the containerized waste, several suspected ash piles, areas with heavy soil discoloration and areas affected by incinerator ash will be sampled for disposal characteristics. Upon receipt of analytical results, these areas will be bulked according to waste stream and loaded for disposal into appropriate containers.

3.7 LABPACKING

OHM sample technicians shall inventory each small quantity labpack container and segregate them according to waste class. Unknown or unlabeled containers are inventoried, sampled and sent to the on site mobile lab for hazcat analysis. Those that exhibit signs of reacting or are potentially shock sensitive shall be carefully placed in a five gallon container with vermiculite and staged separately from the other containers. Containers tested to be of similar chemical characteristics are grouped together and packaged in the appropriate size drum. The containers shall be placed evenly within the labpack with enough vermiculite to ensure no contact between containers.

3.8 UNDERGROUND STORAGE TANKS

EPA has identified two underground storage tanks (UST) on the site. Tank contents shall be evaluated by retrieving a sample through the fill pipe with a sludge judge. These samples will be sent off site for disposal analysis. OHM will transport and dispose of tank contents upon receipt of the appropriate facility approvals. OHM will provide a task specific amendment for this effort upon further evaluation and discussion with the EPA.

3.9 TEARDOWN/DEMOBILIZATION

Upon completion of the scope of work, OHM will decontaminate equipment used during the performance of the scope of work. A temporary equipment decontamination station will be constructed with multi layered 1 mil polyethylene sheeting. Equipment requiring decontamination will be hand cleaned or pressure washed as necessary. The water generated will be collected and placed in DOT shippable containers. All disposable protective clothing utilized during site operations along with the material from the decontamination stations will be collected in D.O.T. shippable containers and staged for disposal. All work areas will be policed and secured. Personnel and equipment will then be demobilized to their respective place of origin.

3.10 TRANSPORTATION AND DISPOSAL

Prior to removal of waste from the site, OHM will adhere to all applicable local, state and federal requirements. OHM will utilize only those transporters and disposal facilities that are fully licensed and/or permitted. All waste will be properly stored on site pending analytical data and acceptance approval.

Once the disposal analytical reports are received, the T&D Coordinator will evaluate the results and make recommendations on the appropriate disposal facility. Following OSC approval of the facility, the T&D Coordinator will prepare the waste profile sheets for USEPA review and signature, then forward each to the disposal facility for acceptance approval.

The Response Manager will coordinate the loadout of the waste with the OSC after notice of acceptance approval is received from the facility. The majority of waste should be sent to disposal facilities prior to the demobilization of site personnel. If not, OHM will make every effort to schedule the removal of remaining drums at the same time to minimize re-mobilization costs.